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BY ECF

Hon. Jack B. Weinstein
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Kwan Miller
12 Cr 61 (JBW)

Dear Judge Weinstein:

During an April 27, 2012, court appearance before Your Honor, Arnold Keith was relieved as counsel for Mr. Miller and a speedy trial was scheduled for July 30, 2012, primarily at the request of counsel for Mr. Miller's codefendant, Sherieka Smalling. A few weeks later, however, on May 14, 2012, Ms. Smalling entered a guilty plea before Magistrate Judge Mann in the case.

On April 30, 2012, I filed a Notice of Appearance on Mr. Miller's behalf in this matter. I have been hard at work ever since. The discovery provided by the government thus far is extremely voluminous, by a conservative estimate nearly a million pages in documents, alone. And, the government has apparently not completed providing discovery yet. In the last few weeks, the government has provided additional discovery, including, among other items, numerous tape-recorded calls of Mr. Miller which I am obligated to review.

I am a solo practitioner. It is physically impossible for me to adequately review all these materials and prepare a defense within the time allotted. I need more time to provide Mr. Miller with the constitutionally effective representation he deserves. I am, therefore, respectfully requesting an adjournment of the July 30th trial date.

The government has consented to this request.

Respectfully yours,

/JRF/

James R. Froccaro, Jr.

JRF:tp